

# EXHIBIT 2

**From:** [Bret Stanley](#)  
**To:** [Gromada, Veronica G. \(SHB\)](#); [Chris Cox](#)  
**Cc:** [Roopal Luhana](#); [Rachel Abrams](#); [Sarah London](#); [Andrew Kaufman](#); [Priest Johnson, Kimberly \(SHB\)](#); [Shortnacy, Michael \(SHB\)](#); [Kirk, Brittany E. \(SHB\)](#)  
**Subject:** Challenge to Confidential Designation Per Pretrial Order No. 4  
**Date:** Thursday, October 16, 2025 4:36:41 PM  
**Attachments:** [UBER\\_JCCP\\_MDL\\_003941399.pdf](#)

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## EXTERNAL

Ms. Gromada and Counsel –

I’m writing to challenge the designation of UBER\_JCCP\_MDL\_003941399 as Confidential by the Uber Defendants. Attached is the slip-sheet from the production of UBER\_JCCP\_MDL\_003941399 that designates the underlying spreadsheet as confidential in its entirety.

Per Paragraph 2.3 of Pretrial Order 4 (ECF 176 at 2), “Confidential Information or Items” is defined as:

Any Discovery Material that the Producing Party believes in good faith contains:

- financial or business plans or projections;
- proprietary business information, or other confidential research, design, development, financial, business or commercial information;
- information regarding or relating to a Party’s insurance program;
- personnel information;
- personal information about any Party to this lawsuit or employees (current or former) or board members (current or former) of any Party to this lawsuit;
- the personal information and any identifying information of any Non-Party;
- non-public incident reports;
- executive committee selection; and
- any information regarding any Party or Non-Party not otherwise available to the public that is protected from disclosure by law, regulation, or contract.

The Spreadsheet produced as UBER\_JCCP\_MDL\_003941399 does not qualify under the definition contained in Paragraph 2.3 of Pretrial Order 4.

Per Paragraph 6.2 of Pretrial Order 4 (ECF 176 at 11), the parties must attempt to resolve this challenge in good faith and must bring the process by conferring directly within 14 days of the date of this Notice.

Please provide me dates of your availability to meet and confer on the confidentiality designation of this document no later than **October 30, 2025**.

If Counsel is unable to meet and confer by **October 30, 2025**, I will proceed with the Court’s instructions for Judicial Intervention per Paragraph 6.3 of Pretrial Order 4 (ECF 176 at 11-12).

Sincerely,

Bret Stanley



**Bret Stanley** | Senior Counsel

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